

Exhibit I

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

HUONG HOANG,)
)
) Plaintiff,)
)
 vs.) No. 2:11-CV-01709-MJP
)
 AMAZON.COM, INC., et al.,)
)
) Defendants.)

Videotaped 30(b)(6) Deposition Upon Oral Examination
of
AMAZON.COM, INC.
(ADRIAN GARVER)

11:05 A.M.

August 2, 2012

1201 Third Avenue, Ste. 1600

Seattle, Washington

Valerie L. Seaton, RPR, CCR

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ALSO PRESENT:

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CHARLES WRIGHT

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1 Q. And does Amazon's legal department also
2 represent IMDb?

3 A. Amazon.com's legal department provides legal
4 services for IMDb. So...

5 Q. Is there any other entity that provides
6 in-house counsel service to IMDb?

7 MS. ROOS: Object to form. Go ahead.

8 A. I'm unaware of any -- of any -- any direct
9 relationships between IMDb and any other legal
10 professionals. Amazon.com would be the party that
11 would hire any outside counsel that represents IMDb.

12 Q. (BY MR. SZEGO) All right. Now, do Amazon
13 and IMDb share database information regarding their
14 customers?

15 MS. ROOS: Object to form.

16 A. To my -- you know, I know that Ama- -- that
17 IMDb processes credit card payments via Amazon.com's
18 system. So to the degree that you ask do they share, I
19 wouldn't describe it as a sharing. More that
20 essentially IMDb subscriber credit card transactions
21 are essentially transacted via Amazon's services or
22 Amazon systems.

23 Q. (BY MR. SZEGO) Responding to the objection
24 to form, do you -- in front of you, you have a document
25 which has been marked No. 1. Have you had time to

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1 A. You know, I'm not specifically aware of the
2 mechanics of how the credit card information is
3 handled. It's, again, not in my expertise, so I can't
4 speak to it. But CSC database is where -- CSC,
5 customer service tool essentially, CSC is where the
6 information about Amazon customer information can be
7 looked at by Amazon employees. So the details of how
8 payments for IMDb are transacted is beyond my technical
9 knowledge.

10 Q. With respect to Amazon's legal department's
11 role with IMDb.com, specifically, does -- does amazon's
12 legal department advise IMDb regarding its privacy
13 practices?

14 A. Amazon.com's legal department provides legal
15 services of all types for IMDb. So to the degree that
16 there's a legal need of any sort by IMDb, it would be
17 addressed by Amazon.com's legal department. So
18 presumably, that would also include the privacy policy.

19 Q. I'm going to give you a document which will
20 be marked as No. 2.

21 (Exhibit No. 2 marked.
22 for identification.)

23 Q. (BY MR. SZEGO) Have you had adequate time to
24 review that document?

25 A. Yes.

1 C E R T I F I C A T E

2 STATE OF WASHINGTON)
3) SS.

4 COUNTY OF PIERCE)

5 I, the undersigned Washington Certified Court
6 Reporter, pursuant to RCW 5.28.010 authorized to
7 administer oaths and affirmations in and for the State
8 of Washington, do hereby certify:

9 That the annexed and foregoing deposition
10 consisting of Pages 1 through 20 of the testimony of
11 each witness named herein was taken stenographically
12 before me and reduced to typed format under my
13 direction;

14 I further certify that according to CR 30(e)
15 the witness was given the opportunity to examine, read
16 and sign the deposition after the same was transcribed,
17 unless indicated in the record that the review was
18 waived;

19 I further certify that all objections made at
20 the time of said examination to my qualifications or
21 the manner of taking the deposition or to the conduct
22 of any party have been noted by me upon each said
23 deposition;

24 I further certify that I am not a relative or
25 employee of any such attorney or counsel, and that I am
not financially interested in the said action or the
outcome thereof;

I further certify that each witness before
examination was by me duly sworn to testify the truth,
the whole truth and nothing but the truth;

I further certify that the deposition, as
transcribed, is a full, true and correct transcript of
the testimony, including questions and answers, and all
objections, motions, and exceptions of counsel made and
taken at the time of the foregoing examination and was
prepared pursuant to Washington Administrative Code
308-14-135, the transcript preparation format
guidelines;

I further certify that I am sealing the
deposition in an envelope with the title of the above

1 cause and the name of the witness visible, and I am
2 delivering the same to the appropriate authority;

3 I further advise you that as a matter of firm
4 policy, the Stenographic notes of this transcript will
5 be destroyed three years from the date appearing on
6 this Certificate unless notice is received otherwise
7 from any party or counsel hereto on or before said
8 date;

9 IN WITNESS WHEREOF, I have hereunto set my
10 hand and affixed my official seal this 14th day of
11 August, 2012.

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Certified Court Reporter in
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